

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	1:19-cr-10040-JDB
	)	<b>Cr. No.:</b> _____
	)	
	)	<b>21 U.S.C. § 846</b>
<b>vs.</b>	)	<b>21 U.S.C. § 841(a)(1)</b>
	)	<b>21 U.S.C. § 861(f)</b>
	)	<b>21 U.S.C. § 856(a)(1)</b>
	)	<b>18 U.S.C. § 2</b>
<b>JEFFREY W. YOUNG, JR.</b>	)	
<b>ALEXANDER ALPEROVICH, M.D., and</b>	)	
<b>ANDREW RUDIN, M.D.</b>	)	<b><u>FILED UNDER SEAL</u></b>
	)	
<b>Defendants.</b>	)	

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**MOTION TO SEAL INDICTMENT**

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Comes now the United States of America, by and through D. Michael Dunavant, United States Attorney for the Western District of Tennessee, and Beth Boswell, Assistant United States Attorney, and would respectfully move this Honorable Court to seal the indictment in this case and unseal it when the defendant is in custody.

Based on the foregoing, the United States respectfully requests that the indictment be sealed.

**WHEREFORE**, counsel for the United States respectfully moves this Honorable Court to seal the indictment and order that it remain sealed until the defendant is in custody or further Order of this Court.

Respectfully submitted,

D. Michael Dunavant  
United States Attorney

By: s/Victor L. Ivy  
VICTOR L. IVY  
Assistant United States Attorney  
United States Attorney's Office  
109 S. Highland Ave., Suite 300  
Jackson, TN 38301  
731-422-6220

**CERTIFICATE OF SERVICE**

I, Victor L. Ivy, Assistant United States Attorney, for the Western District of Tennessee, hereby certify that a copy of the foregoing motion was electronically filed, hand delivered, and/or mailed, first class postage prepaid to the Court.

This 15th day of April, 2019.

By: s/Victor L. Ivy  
VICTOR L. IVY